REMARKS/ARGUMENTS

Applicant hereby affirms the verbal election, with traverse, of the claims of Group 1 (claims 19 - 36) made telephonically by Mark Levy, Attorney for Applicant on September 20, 2004.

Reconsideration of the above-identified application is respectfully requested in view of the foregoing amendments and the following remarks. The non-elected claims 1 - 18 and 45 - 52 were cancelled in the Preliminary Amendment filed July 18, 2004. Claims 19 - 36 are hereby cancelled without prejudice. Therefore, claims 1 - 52 have been cancelled. Claims 53 - 64 have been added and remain in the case.

The present invention features a method of training a user to become an expert in identifying an object in an image or scene, by querying a computer system using a special programming language adapted to describe objects in images. The computer system has a lexicon of photo-interpreters (i.e., a "dictionary" of words and phrases routinely used by persons who perform photo interpretation) that form the basis for the programming language. A user of the inventive system may formulate object extraction rules, as he or she becomes more expert in object recognition and extraction. The inventive method consists of providing a programming language that has information supplied by at least one expert photo analyst, and has optional extraction rules that are dependent upon that information, as well as information input provided by the user. The programming language has a vocabulary (i.e., lexicon of photo-interpreters) for facilitating descriptions of objects to be identified. Graphical results of the user's queries are interactively displayed to aid in determining whether an object has been identified by the user. In more advanced embodiments, the user can mark a feature of interest of the image and direct the computer system to generate descriptive words, phrases and rules for defining that feature of interest.

The drawings were objected to; a form PTO-948 was enclosed with the instant Office Action. Applicant notes that

the instant drawings are identical to drawings already
published in issued United States Patent No. 6,724,931, the
application for which is the parent of the instant divisional
application. The FIGURES objected to are 4 - 6, 9, 11a, and
26, all of which are color photographs (including shades of
gray) of screen shots of a computer implementation of the
method of the invention. The "shading" objected to is
generally part of an image. It is believed that the
disclosure would be less explanatory if above-identified
drawings were to be modified in accordance with PTO-948. A
review of the drawings by the undersigned reveals no problem
of legibility. Consequently, Applicant respectfully traverses
the objection to the drawings.

The specification was objected to because of language
used in the Abstract of the Disclosure. A re-written Abstract
of the Disclosure is provided which overcomes the objection to
the specification.

Claims 19 - 22, 24 - 26, and 31 - 36 were rejected under
35 U.S.C. §102(e) as being anticipated by United States Patent
No. 5,793,888 for MACHINE LEARNING APPARATUS AND METHOD FOR
IMAGE SEARCHING, issued August 11, 1998 to Richard L. Delanoy.
DELANOY teaches a method of training a computer based object
recognition system, NOT a method for training human photo-
interpreters. In accordance with the DELANOY method, expert
photo-interpreters refine the computer-based recognition
system, exactly the OPPOSITE of Applicant's disclosed and
claimed system wherein the computer system is used to train
neophyte "users" (i.e., photo-interpreters). The crux of
Applicant's novel system is a human interface programming
language, dependent upon a computer system supporting the
programming language and providing graphical feedback helping
such neophyte users to structure queries and thereby learn the
lexicon and practice of the photo interpretation profession.

Because claims 19 - 22, 24 - 26, and 31 - 36 have now
been cancelled, their rejection under 35 U.S.C. §102(e) as
anticipated by DELANOY is moot. The newly-added claims more
precisely recite Applicant's novel method which is completely

different and patentably distinct from the teachings of
DELANOY.

Claims 23 and 27 - 29 were rejected under 35 U.S.C.
§103(a) as being unpatentable over DELANOY in view of United
States Patent No. 5,914,720 for METHOD OF USING MULTIPLE
PERCEPTUAL CHANNELS TO INCREASE USER ABSORPTION OF AN N-
DIMENSIONAL PRESENTATION ENVIRONMENT, issued June 22, 1999 to
Creve Maples et al. MAPLES et al. teach a synthetic
presentation environment which facilitates presentation of
complex information. Nothing in the teaching of MAPLES et al.
teaches or suggests Applicant's novel training method. It is
conceivable that a presentation system such as that of MAPLES
et al. might be utilized as a portion of an implementation of
Applicant's method of training a user in the art of photo
interpretation, but the MAPLES et al. system in and of itself
has nothing whatsoever to do with Applicant's novel method,
per se. As discussed hereinabove, DELANOY fails to either
teach or suggest Applicant's method. Adding the teaching of
MAPLES et al. thereto still falls short of modifying DELANOY
to do so. The cancellation of claims 23 and 27 - 29 renders
their rejection under 35 U.S.C. §103(a) over DELANOY in view
of MAPLES et al. moot. As also discussed hereinabove, the
newly-added claims are not suggested by DELANOY and/or MAPLES
et al., either individually or in combination.

Claim 30 was rejected under 35 U.S.C. §103(a) as being
unpatentable over DELANOY in view of United States Patent
No.5,234,346 for EDUCATIONAL AND TRAINING SIMULATOR SYSTEM AND
METHOD, issued August 10, 1993 to James W. Rice. RICE teaches
a system for creating a virtual reality (VR) environment for
larger groups of participants. Visual, auditory, olfactory,
sensual and other stimulants are used to generated or
reproduce a virtual experience in the RICE VR environment. No
teaching in RICE describes training a user in the art of photo
interpretation by providing a programming language
incorporating a lexicon of a photo interpreter and useful for
describing an object in an image. For at least the reasons
discussed hereinabove, DELANOY fails to teach or suggest
Applicant's novel training method. Adding the teaching to
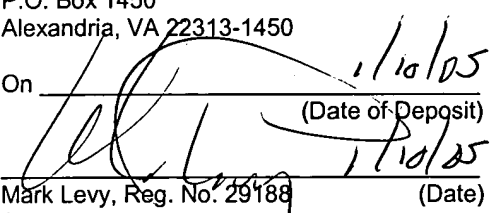RICE thereto still fails to provide a combination that either

teaches or suggests a system in accordance with Applicant's disclosure and claims. Applicant's system features a special programming language useful for describing an object in an image, Applicant's system further having the capability of providing graphical feedback to show a user the region the actually described in response to a query formulated in the novel programming language.

The cancellation of claim 30 renders it rejection moot and the newly-added claims recite no subject matter taught or suggested by DELANOY and/or RICE, singly, or in combination.

Applicant believes that claims 53 - 64 are allowable and therefore respectfully requests that claims 53 - 64 be allowed and the application passed to issue.

Respectfully submitted,
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